

STEPHANIE M. HINDS (CABN 154284)
United States Attorney

THOMAS A. COLTHURST (CABN 99493)
Chief, Criminal Division

NOAH STERN (CABN 297476)
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-7200
FAX: (415) 436-7234
Noah.Stern@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	NOS. CR 20-190-JD
)	CR 21-187-JD
Plaintiff,)	
)	STIPULATION TO CONTINUE STATUS
v.)	HEARING FROM APRIL 18, 2022 TO MAY 2,
)	2022 AND EXCLUDE TIME AND [PROPOSED]
ADAN ROLDAN,)	ORDER
)	
Defendant.)	

It is hereby stipulated by and between counsel for the United States and counsel for the defendant Adan Roldan, that the status hearing scheduled for April 18, 2022 at 10:30 a.m. be vacated and rescheduled for May 2, 2022 at 10:30 a.m. The parties further stipulate that time be excluded under the Speedy Trial Act from April 18, 2022 through May 2, 2022.

On March 25, 2022, the Court entered an order on the parties' stipulation continuing the status conference set for March 28, 2022 to April 18, 2022. Dkt. No. 75. The reasons for the parties' stipulation included that Mr. Roldan's codefendant in the case, Geoffrey Mark Palermo, was seeking to obtain new counsel and the parties wished for the status conference to proceed when all parties could be present to discuss the case. Mr. Palermo has not yet filed a notice of new counsel. However, the

government has been informed by Keker, Van Nest, and Peters LLP that Mr. Palermo and his new counsel will be available for a status conference on May 2, 2022 at 10:30 a.m. Therefore, the government and Mr. Roldan stipulate to continue Mr. Roldan's status conference for the same reasons stated in the parties' prior stipulation. Undersigned counsel further stipulate that time be excluded under the Speedy Trial Act so that defense counsel can continue to prepare, including by reviewing the discovery already produced. For this reason, the undersigned counsel stipulate and agree that excluding time until May 2, 2022 will allow for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate and agree that the ends of justice served by excluding the time from April 18, 2022 through May 2, 2022 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

The undersigned Assistant United States Attorney certifies that he has obtained approval from counsel for the defendant to file this stipulation and proposed order.

IT IS SO STIPULATED.

DATED: April 14, 2022

/s/
NOAH STERN
Assistant United States Attorney

DATED: April 14, 2022

/s/
MARK GOLDROSEN
Counsel for Defendant ADAN ROLDAN

~~[PROPOSED]~~ ORDER

Based upon the facts set forth in the stipulation of the parties and for good cause shown, the Court vacates the status conference scheduled for April 18, 2022 and reschedules it for May 2, 2022 at 10:30 a.m. The Court finds that failing to exclude the time from April 18, 2022 through May 2, 2022 would unreasonably deny defense counsel and the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time from April 18, 2022 to May 2, 2022 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the time from April 18, 2022 through May 2, 2022 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

IT IS SO ORDERED.

DATED: April 15, 2022



HON. JAMES DONATO
United States District Judge